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Public Service Commission

March 9, 2012

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Ansley Watson, Jr., Esquire
Macfarlane Ferguson & McMullen
P. O. Box 1531
Tampa, Florida 33601 -1531

Beth Keating, Esquire
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, Florida 32301

STAFF'S SECOND DATA REQUEST

Re: Docket No. 110271-GU, Petition for approval of transportation service agreement with Florida Public Utilities Company, by Peninsula Pipeline Company, Inc. and Docket No. 110277-GU, Application for approval of tariff revisions to reflect service in Nassau and Okeechobee Counties, by Florida Public Utilities Company

Dear Ms. Keating and Mr. Watson:

By this letter, the Commission staff requests that Peoples Gas System, Peninsula Pipeline Company and Florida Public Utilities Company provide responses to the following data requests concerning the above-entitled dockets.

Questions for Peoples:

1. Please state how many interconnections Peoples has with FGT and how many with SNG in this area west of Jacksonville.
2. Please discuss the timeline of the construction process.
3. Regarding the temporary release of interstate pipeline capacity on FGT to FPUC, please state:
 - a. The expected annual savings to Peoples' customers through the PGA resulting from the release of the capacity
 - b. Will FPUC need the capacity on a permanent basis? If so, please state the reason(s) the release is referred to as being "temporary."
 - c. State the reason(s) why Peoples has excess pipeline capacity allowing Peoples to release some to FPUC. State whether Peoples' ratepayers are paying for it through the PGA.

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4. Please provide a breakdown of Peoples' expansion costs into Nassau County between costs incurred for construction of the white line, yellow line, and orange line on the map provided at the March 7, 2012 meeting. Please provide the information by line segment.
5. Please state the costs Peninsula will be responsible for, and the costs for which RockTenn will be responsible.
6. Please state the manner in which RockTenn will pay for the construction costs assigned to it.
7. Regarding the Gas Transportation Agreement between Peoples and Peninsula filed in Docket No. 110277-GU, please discuss the costs the reservation charge is designed to recover.
8. Please provide workpapers showing that the reservation charge recovers all costs Peoples incurs to serve Peninsula and that Peoples' ratepayers are not adversely affected by the agreement.
9. Please explain how the usage charge was determined and how and when the usage charge will be applicable.

Questions for Peninsula:

The following questions refer to confidential Attachment 1 (Comparison of Nassau County Cost) provided in the amended petition filed in Docket No. 110271-GU:

10. Please explain the Peninsula Pipeline Company (PPC) Costs in the original and in the amended agreement.
11. The cost comparison is shown for 6 years, however, the FPUC – Peninsula contract is for a longer time period. Please provide the same table for the length of the contract.
12. Please explain what the numbers in the line Savings (Cost) represent.

Questions for FPUC:

13. Since Peninsula filed an amended and revised transportation service agreement on February 8, 2012, in Docket No. 110271-GU, please explain why FPUC did not have to re-issue a request for proposals.
14. In response to Staff's First Data Requests in Docket No. 110271-GU, FPUC filed an evaluation of proposals (confidential document.) Please provide an updated evaluation of proposals based on the amended transportation service agreement.
15. The petition in Docket No. 110277-GU states that FPUC has been pursuing plans to extend their distribution facilities to provide service in Nassau County. Please discuss how FPUC will recover the costs of such extension.

Staff's Second Data Request

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Please file the original and 3 copies of the requested information by Friday, March 16, 2012 with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me with any questions at (850) 413-6212.

Sincerely,

A handwritten signature in black ink, appearing to read "Martha F. Barrera". The signature is fluid and cursive, with a long horizontal flourish at the end.

Martha F. Barrera
Senior Attorney

MFB

cc: Office of Commission Clerk
Division of Economic Regulation (Draper)